

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

CHARLES A. WAKEFIELD,

)

Plaintiff,

)

vs.

)

Case No. CIV-17-1006-R

SODEXO USA,

)

Defendant.

)

AFFIDAVIT OF KEVIN BENDA

1. My name is Kevin Benda, Director of Custodial and Ground Services for Sodexo School Services at Norman Public Schools. I am above the age of 18, am authorized and competent to make this affidavit, and I do so as a representative of the Defendant, having knowledge of the facts stated herein, which I believe to be true and correct to the best of my ability and belief.

2. Sodexo is a company that offers outsourcing solutions in food service, housekeeping, and grounds keeping (among other services) to corporations, health care and long-term care facilities, senior living communities, schools, college campuses, government agencies and military sites. Sodexo's *Schools Services* segment provides a full range of services -- including custodial and cleaning services -- to K-12 schools, including schools within the Norman Public School District.

3. The only EEOC charge or other protected activity by the plaintiff that I was aware of during the plaintiff's employment was EEOC Charge 564-2015-1475 dated October 21, 2015 alleging that the difference between his starting rate of his pay at the

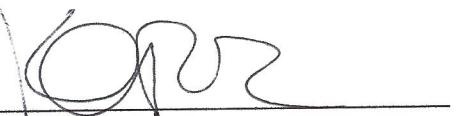
EXHIBIT

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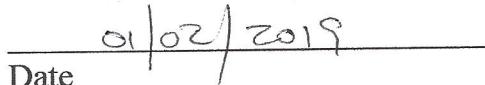
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beginning of employment in Norman in October 2012 and the starting rate of pay of his coworker in the West Zone of Norman (Blayke Humphrey), was the result of age and race discrimination.

I declare under penalty of perjury that the foregoing is true and correct.



Signature



Date